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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID DUONG,

Defendant.

Case No. CR 25-0003 YGR (KAW)

**STIPULATION AND ~~PROPOSED~~
ORDER TO TEMPORARILY MODIFY
CONDITIONS OF RELEASE**

Defendant David Duong and the United States hereby stipulate and agree as follows:

1) Mr. Duong made his initial appearance on January 17, 2025. The Court set conditions of release, including that Mr. Duong not travel outside the Northern and Eastern Districts of California.

2) The parties stipulate and agree that those conditions should be temporarily modified to permit Mr. Duong to travel out of the district as follows:

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1 April 1 - April 3, 2025 to New York, NY;
2 May 6 - May 9, 2025 to Las Vegas, NV; and
3 May 31 - June 1, 2025 to Westminster, CA.

3) Pretrial Services Officer Vanessa Vargas has no objection to the proposed travel.

4 IT IS SO STIPULATED.

5
6 Dated: March 25, 2025

/s/

August Gugelmann
SWANSON & McNAMARA LLP
Attorneys for David Duong

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10 /s/

Abraham Fine
Assistant United States Attorney

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15 **[PROPOSED] ORDER**

16 Pursuant to stipulation, Mr. Duong's conditions of release are temporarily modified to
17 permit travel to New York (April 1-3, 2025), Las Vegas (May 6-9, 2025), and Westminster CA
18 (May 31-June 1, 2025).

19 IT IS SO ORDERED.

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21 Dated: March 28, 2025



Hon. Kandis A. Westmore
United States Magistrate Court